

# EXHIBIT 299

CAROL T. JACOBS  
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023

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1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES )  
6 VIRGIN ISLANDS, )

7 Plaintiff, )

8 VS. )

9 JP MORGAN CHASE BANK, N.A., )

10 Defendant. )

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14  
15 VIDEO RECORDED DEPOSITION OF

16 CAROL THOMAS JACOBS

17 THURSDAY, JULY 13, 2023

18  
19  
20 REPORTED BY:

21 DENISE D. HARPER-FORDE  
22 Certified Shorthand Reporter (CSR)  
23 Certified RealTime Reporter (CRR)  
24 Certified LiveNote Reporter (CLR)  
25 Registered Professional Reporter (RPR)  
Notary Public (FLORIDA)

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1 ATTORNEY NEIMAN: All right.

2 ATTORNEY ACKERMAN: Okay.

3 (BY ATTORNEY NEIMAN):

4 Q. Ms. Thomas-Jacobs, I'm showing  
5 you a document that's marked as  
6 Exhibit 2. And this is the E-mail  
7 exchange between Jeffrey Epstein and  
8 somebody named Cecile de Jongh on  
9 March 17th of 2019, which is three  
10 days after the letter that we've been  
11 looking at.

12 Do you know Cecile de Jongh?

13 A. I know of Cecile de Jongh. I  
14 don't personally know Cecile de Jongh.

15 Q. All right.

16 A. I know she was -- she's the --  
17 she's Governor De Jongh's wife.

18 Q. Okay. And were you aware that  
19 Ms. De Jongh worked for Mr. Epstein?

20 A. I think everyone in the Virgin  
21 Islands knew that.

22 Q. Okay. And did you ever  
23 interact with Ms. De Jongh related to  
24 Mr. Epstein?

25 A. No.